

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

FEDERAL TRADE COMMISSION,

Plaintiff,

Case No. 2:22-cv-11120-BAF-APP

v.

FINANCIAL EDUCATION SERVICES,
INC., *et al.*,

Defendants.

_____ /

**DEFENDANTS CHRISTOPHER TOLOFF AND MICHAEL TOLOFF’S
MOTION TO SEAL AND BRIEF IN SUPPORT**

Defendants Michael Toloff and Christopher Toloff (collectively, “Defendants”) pursuant to E.D. Mich. LR 5.1 and 7.1, move the Court to grant them leave to file the Gayle L. Toloff Revocable Living Trust under seal. Pursuant to E.D. Mich. LR 7.1(2)(A), the Toloffs held a conference with Plaintiff in which the Toloffs explained the nature of the motion and its legal basis and requested. Plaintiff indicates it does not object to the Motion to Seal.

Good cause exists to file the Gayle L. Toloff Revocable Living Trust under seal because it contains sensitive and personal information related to a private trust agreement revealing the name and information of the grantor, revealing privately held assets of the grantor, as well as names of beneficiaries and potential benefits

beneficiaries who may inherit. As such, Defendants request the Court seal the
Gayle L. Toloff Revocable Living Trust.

Respectfully submitted,

/s/ Helen Mac Murray

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 27th day June, 2022, a true and accurate copy of the foregoing was filed with the Court's ECF Electronic filing system which will electronically serve all parties and counsel of record.

Respectfully submitted,
/s/ Helen Mac Murray

*Counsel for Michael Toloff
and Christopher Toloff*